

INITIAL INTERROGATORIES TO McGUIGAN

1. What is the full name, address, Social Security number and date of birth of the person answering these interrogatories, and, if applicable, the person's official position or relationship with the party to whom the interrogatories are directed?

Answer:

John Michael McGuigan (co-defendant). 43 Lakewood Drive, Pittsfield, Massachusetts.
My social security number is [REDACTED]. My date of birth is 1/27/1959.

2. List all former names and when you were known by those names.

Answer:

I have always been known by the following names: John Michael McGuigan, John McGuigan, Michael McGuigan, J. Michael McGuigan, John M. McGuigan, J. M. McGuigan.

3. State all addresses where you have resided/lived from January 1, 1995, through the present.

Answer:

500 Pittsfield Road, Apt C-7, Lenox, Massachusetts
5160 Las Verdes Circle, Apt 121, Delray Beach, Florida
3800 Galt Ocean Drive, Apt 1502, Fort Lauderdale, Florida
564 NE 27th Court, Wilton Manors, Florida
6972 NW 8th Street, Margate, Florida
538 Madison Avenue, Albany, New York
4 Mansion Boulevard, Apt. M, Delmar, New York
15 Kensington Avenue, Pittsfield, Massachusetts
43 Lakewood Drive, Pittsfield, Massachusetts

4. Have you ever been convicted of a crime, other than any juvenile adjudication, which under the law under which you were convicted was punishable by death or imprisonment in excess of one year, or that involve dishonesty or a false statement regardless of the punishment? If so, state as to each conviction the specific crime and the date and place of conviction.

Answer:

I have never been convicted of any crime.

5. Please state the address of any residence or home which you have had an ownership interest in from January 1, 1995, to the present. Please identify any person or persons who would have maintained an ownership interest in any property identified in response to this interrogatory.

Answer:

500 Pittsfield Road, Apt C-7, Lenox, Massachusetts (sold in 1996)
5160 Las Verdes Circle, Apt 121, Delray Beach, Florida (sold in 2001)
6972 NW 8th Street, Margate, Florida (foreclosed 2013)

I do not know who presently owns the above properties.

I own my current residence 43 Lakewood Drive, Pittsfield, Massachusetts

6. Have you ever been arrested for any crime or violation involving a lewd or unnatural and lascivious act involving a minor child? If so, identify the arresting agency, the date of the arrest and the outcome of the proceeding.

Answer:

I have never been arrested for any crime or violation involving a lewd or unnatural and lascivious act involving a minor child.

7. Identify the full name and date of birth of the person you identified as your "godson" in your initial application for approval as a licensed foster care parent with Defendant, Kids in Distress.

Answer:

My godson's name is Christian Tyler Kuryla, born 10/24/1996.

8. State whether or not anyone in your family has ever been convicted of a crime against a minor or minors. If so, state the name of the family member, the person's relationship to you, the state in which the conviction occurred, and the date of said conviction.

Answer:

My biological father, John Joseph McGuigan, was convicted of crimes against minors, in Massachusetts. I believe this occurred in 1986.

9. State the names and dates of birth of all children/minors who resided with you as foster children from January 1, 2000, to the present. As to each child please state the basis reason the child left, or was removed from, your care as a foster parent.

Answer:

- Gabriel Myers first placement (I do not recall his d.o.b.) – left my home to be reunified with extended family.
- Christopher Miles Marrero (a.k.a. Christopher Michael McGuigan), born 7/2/2006 – removed from my home pending the outcome of a dependency proceeding.
- Gabriel Myers second placement (I do not recall his d.o.b.) – removed from my home at my request due to dangerous behavior and threats made toward me and my adopted son, Christopher.
- Ryan Smith (born sometime in May, 2003) – removed from my home pending the outcome of a dependency proceeding.
- (infant) Tristian (I do not recall his last name or d.o.b.) – removed from my home pending the outcome of a dependency proceeding.

10. State the names and last known addresses of all persons who you used/named as “personal references” in your initial application for approval as a licensed foster care parent with Defendant, Kids in Distress.

Answer:

Kathleen Cannon, 2571 NE 15th Street, Pompano Beach, Florida
Jean Starkey, 1040 NE 7th Avenue #26, Fort Lauderdale, Florida
Maxine Lemarr, 3000 Palm Aire Drive North #202, Pompano Beach, Florida

11. State if you have any children, whether biological or adopted. If you do have any children please state his or her full name and last known address.

Answer:

I do not have any biological or adopted children.

12. Were you charged with any violation of law (including any regulations or ordinances) arising out of the incident described in the complaint? If so, what was the nature of the charge; what plea or answer, if any, did you enter to the charge, what court or agency heard the charge; was any written report prepared by anyone regarding this charge, and, if so, what is the name and address of the person or entity that prepared the report; do you have a copy of the report; and was the testimony at any trial, hearing, or other proceeding on the charge recorded in any manner, and, if so, what is the name and address of the person who recorded the testimony?

Answer:

I have never been charged with any violation of law arising out of any incident described in the complaint.

13. Describe any and all policies of insurance which you contend cover or may cover you for the allegations set forth in plaintiff's complaint, detailing as to such policies the name of the insurer, the number of the policy, the effective dates of the policy, the available limits of liability, and the name and address of the custodian of the policy.

Answer:

I have no insurance policies.

14. List the names and addresses of all persons who are believed or known by you, your agents, or your attorneys to have any knowledge concerning any of the issues in this lawsuit; and specify the subject matter about which the witness has knowledge.

Answer:

Other than attorneys, their associates, and the parties to this lawsuit, I am unaware of any persons with knowledge of any of the issues in this lawsuit.

15. Have you made an agreement with anyone that would limit that party's liability to anyone for any of the damages sued upon in this case? If so, state the terms of the agreement and the parties to it.

Answer:

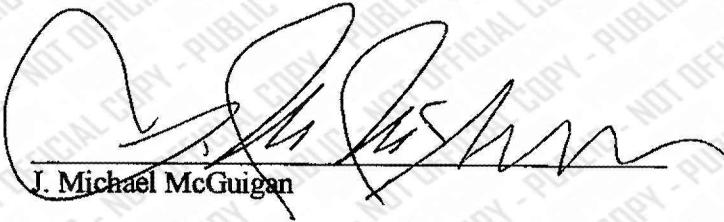
I have made no agreement with anyone that would limit that party's liability to anyone for any of the damages sued upon in this case.

16. State if you have ever been a party, either plaintiff or defendant, any lawsuit other than the present matter, and, if so, state whether you are plaintiff or defendant, the nature of the action, and the date and court in which suit was filed.

Answer:

I have never before been a party to any lawsuit.

I have read the foregoing Answers to *Initial Interrogatories to McGuigan* and do swear
that they are true.

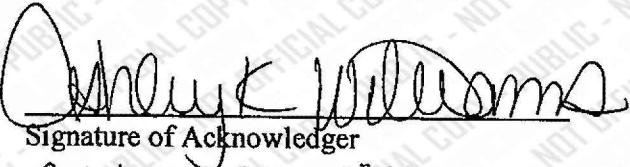


J. Michael McGuigan

STATE OF Massachusetts : ss.
COUNTY OF Berkshire:

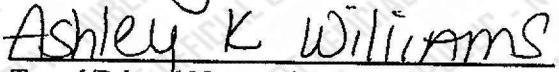
The foregoing instrument was acknowledged before me this 7th day of September
2016, by J. Michael McGuigan, who is personally known to me or who has produced
MADL S42830218 1/27/18 as identification.

My Commission Expires:



Ashley K. Williams

Signature of Acknowledger



Ashley K. Williams

Typed/Printed Name of Acknowledger

FSR

Title or Rank

Serial Number, if any

Ashley K. Williams
Notary Public
Commonwealth of Massachusetts
My Commission Expires
May 15, 2020.